

Relief Requested Without Hearing

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:)	
)	
KITTERY POINT PARTNERS, LLC,)	Chapter 11
)	Case No. 17-20316
Debtor.)	
)	

(AMENDED) CONSENTED-TO MOTION TO ENLARGE DEADLINE

Debtor Kittery Point Partners, LLC requests entry of an order enlarging the deadline for the parties to file a stipulation of undisputed facts, if any; (b) a list of each party's proposed witnesses, (except for witnesses who may be called solely for impeachment purposes), including a brief summary of the expected testimony from each witness; and (c) a list of each party's exhibits (except for exhibits which may be offered for impeachment or rebuttal purposes), including an indication of those that may be subject to objections by one day from November 12, 2019 through and including November 13, 2019. In support of this request, Debtor states as follows:

1. The Court issued an Order Setting Date for Trial and Related Deadlines ("Trial Order") [Dkt. No. 228] on August 20, 2019.

2. The Trial Order sets November 12, 2019 as the deadline for the parties to file a stipulation of undisputed facts, if any; (b) a list of each party's proposed witnesses, (except for witnesses who may be called solely for impeachment purposes), including a brief summary of the expected testimony from each witness; and (c) a list of each party's exhibits (except for exhibits which may be offered for impeachment or rebuttal purposes), including an indication of those that may be subject to objections. Trial Order, ¶ 6.

3. Counsel for the Debtor is working to finish a post-trial brief in a state court case that is due November 8th. As such, and given that Monday is a holiday, Debtor requests a one-day extension on that deadline, making those items due on Wednesday, November 13th.

4. ***Bayview Loan Servicing, LLC consents to the relief requested herein.***

5. Given this consent and the routine nature and non-adversarial nature of this request, the Debtor requests that the relief requested herein be granted without a hearing. D.Me. LBR 9013-1(g)(2)(i) and (ii).

WHEREFORE, the Debtor respectfully requests that the Court enter an Order:

(A) enlarging the deadline for the parties to file the items required by ¶ 6 of the Trial Order by one day from November 12, 2019 through and including November 13, 2019; and

(B) granting such further and additional relief as the Court deems proper.

DATED: November 8, 2019

/s/ David C. Johnson

George J. Marcus, Esq.

David C. Johnson, Esq.

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Attorneys for the Debtor

CERTIFICATE OF SERVICE

I, David C. Johnson, hereby certify that I am over eighteen years old and caused a true and correct copy of the above document and proposed Order to be served electronically on the parties at the addresses set forth on the **SERVICE LIST** set forth below on the 8th day November, 2019.

/s/ David C. Johnson

David C. Johnson

Mailing Information for Case 17-20316

Electronic Mail Notice List

- David C. Johnson bankruptcy@marcuslegg.com, dcj@marcuslegg.com
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